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[Additional counsel appear on signature page]

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

BEE, DENNING, INC., d/b/a  
PRACTICE PERFORMANCE  
GROUP; and GREGORY CHICK,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

CAPITAL ALLIANCE GROUP; and  
NARIN CHARANVATTANAKIT,

Defendants.

NO. 3:13-cv-02654-BAS-WVG

**NOTICE OF MOTION AND  
PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

Complaint Filed: 11/5/13

Honorable Cynthia Bashant

DATE: October 20, 2014

TIME: 10:30 a.m.

COURTROOM: 4B, 4th Fl. Schwartz

**NO ORAL ARGUMENT UNLESS  
REQUESTED BY THE COURT**

NOTICE OF MOTION AND  
PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION

3:13-cv-02654-BAS-WVG

1 TO: ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF  
2 RECORD:

3 PLEASE TAKE NOTICE that on Monday, October 20, 2014, at  
4 10:30 a.m., or as soon thereafter as can be heard, Plaintiffs Bee, Denning, Inc. and  
5 Gregory Chick will and hereby do move this Court for an order granting class  
6 certification. **No oral argument will be heard unless requested by the Court.**

7 This Motion is made on the grounds that Defendants violated the  
8 Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* (“47 U.S.C. § 227”)  
9 by sending unsolicited facsimile advertisements and autodialling and leaving pre-  
10 recorded messages on cellular telephones.

11 This Motion is based upon this Notice of Motion, Motion and associated  
12 Memorandum of Authorities and Declarations in support of Plaintiffs’ Motion for  
13 Class Certification.

14 RESPECTFULLY SUBMITTED AND DATED this 5th day of September,  
15 2014.

16 TERRELL MARSHALL DAUDT  
17 & WILLIE PLLC

18 BY: /s/ Beth E. Terrell, CSB #178181

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8 *Attorneys for Plaintiffs*  
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27 NOTICE OF MOTION AND  
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CERTIFICATION

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on September 5, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Timothy Q. Day, CSB #188732  
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*Attorneys for Defendants*

DATED this 5th day of September, 2014.

TERRELL MARSHALL DAUDT  
& WILLIE PLLC

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